

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Crédito Real, S.A.B. de C.V., SOFOM, E.N.R.,¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 22-10630 (JTD)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), the undersigned counsel enter their appearance as counsel for the ad hoc group of certain unaffiliated (i) beneficial holders, and/or investment advisors or managers of beneficial holders of the outstanding unsecured notes issued by Crédito Real, S.A.B. de C.V., Sociedad Financiera de Objeto Multiple, Entidad No Regulada (the “Putative Debtor”) and (ii) lenders under the Putative Debtor’s prepetition unsecured credit facilities (the “Ad Hoc Group”) and the Petitioning Creditors (the “Petitioning Creditors”) and request that all notices and other papers filed or served in the above-captioned case be served upon the following attorneys:

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-and-

¹ The last four identifying digits of the tax number and the jurisdiction in which the Chapter 15 Debtor pays taxes is Mexico — 6815. The Chapter 15 Debtor’s corporate headquarters is located at Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico.

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PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced case and proceedings herein.

PLEASE TAKE FURTHER NOTICE that filing of this *Notice of Appearance and Request for Notices* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of the Ad Hoc Group and the Petitioning Creditors including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Ad Hoc Group and the Petitioning Creditors are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are

expressly reserved. Unless and until the Ad Hoc Group and the Petitioning Creditors expressly state otherwise, the Ad Hoc Group and the Petitioning Creditors do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

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Dated: August 4, 2022
Wilmington, Delaware

Respectfully submitted,

/s/ Christopher M. Samis

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Creditors*